

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGNACIO RANGEL-BARAJAS,

Defendant.

ED CR No. 5:25-cr-00095-AB

I N D I C T M E N T

[18 U.S.C. § 922(a)(1)(A):  
Engaging in the Business of  
Dealing in Firearms Without a  
License; 18 U.S.C. § 933(a)(3):  
Attempted Trafficking Firearms;  
18 U.S.C. § 924(d)(1), 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 922(a)(1)(A)]

Beginning on an unknown date and continuing through on or about March 14, 2025, in Riverside County, within the Central District of California, and elsewhere, defendant IGNACIO RANGEL-BARAJAS, not being licensed as an importer, manufacturer, or dealer of firearms, willfully engaged in the business of dealing in firearms, including, specifically, the attempted selling, importing, and dealing, on or about March 14, 2025 of the following firearms, as further depicted by the photograph herein:

1           1.    a Glock, model 44, .22 caliber pistol bearing serial number  
2 AKKM208;

3           2.    a Glock, model 19, 9mm caliber pistol, bearing serial  
4 number BGGP953;

5           3.    a Glock, model 19, 9mm caliber pistol bearing serial number  
6 AKUK291;

7           4.    a Taurus, model PT111 G2A, 9mm caliber pistol bearing  
8 serial number ACD780508;

9           5.    a Strum & Ruger, model American Pistol, 9mm caliber pistol  
10 bearing serial number 830-38544;

11          6.    a Strum & Ruger, model Security-9, 9mm caliber pistol  
12 bearing serial number 384-81490;

13          7.    HS Produkt, model XD-9, 9mm caliber pistol bearing serial  
14 number BF483973;

15          8.    a Davis Industries, model P380, .380 caliber pistol bearing  
16 serial number AP283672;

17          9.    a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
18 number SV7135373;

19          10.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
20 number SV7135547;

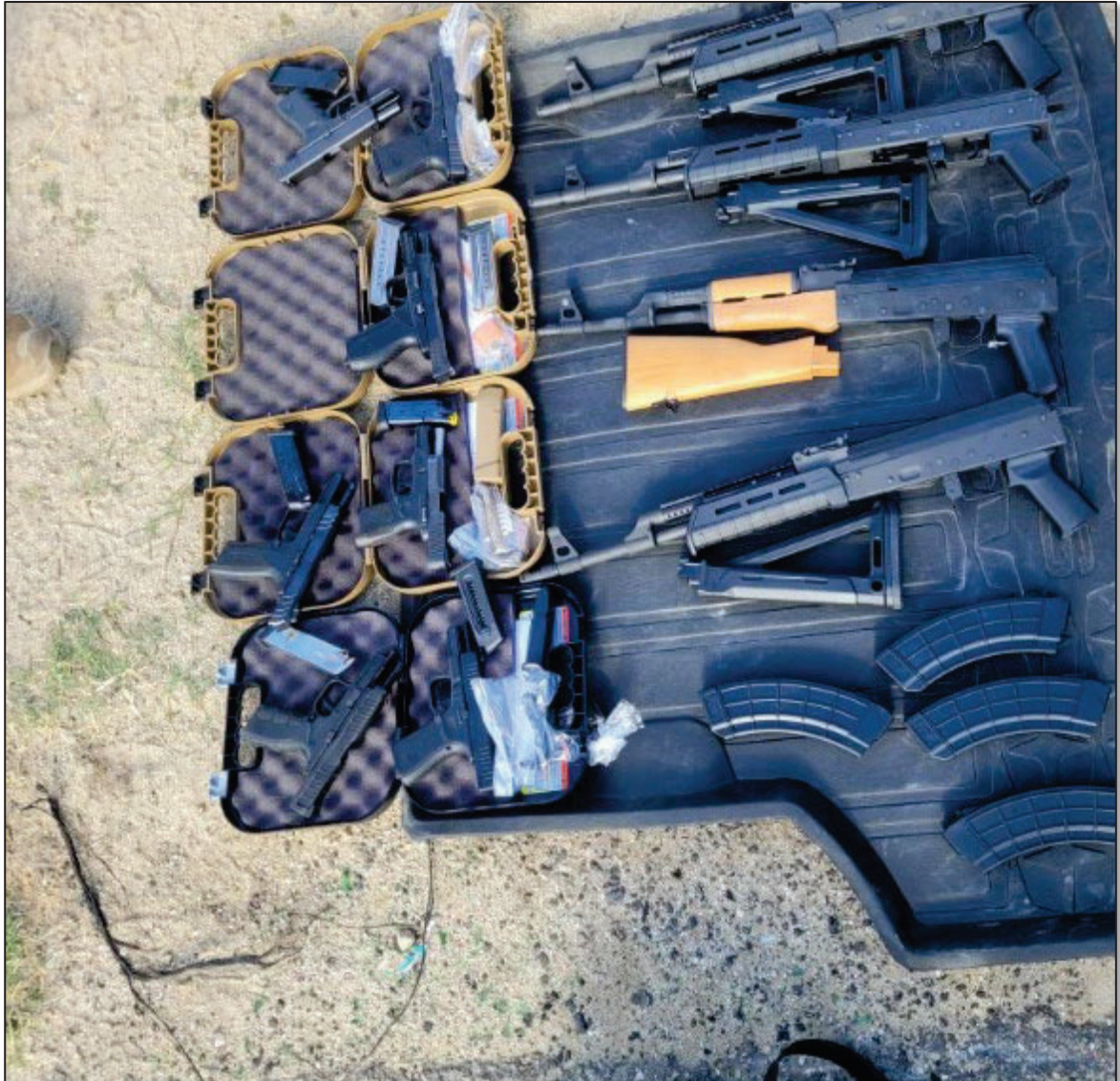
21          11.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
22 number SV7158556; and

23          12.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
24 number SV7135772.

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COUNT TWO

[18 U.S.C. § 933(a)(3)]

On or about March 14, 2025, in Riverside County, within the Central District of California, defendant IGNACIO RANGEL-BARAJAS attempted to ship, transport, transfer, cause to be transported, and otherwise dispose of, the following firearms, each in and affecting interstate commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearms by the recipient would constitute a felony:

1. a Glock, model 44, .22 caliber pistol bearing serial number AKKM208;

2. a Glock, model 19, 9mm caliber pistol, bearing serial number BGGP953;

3. a Glock, model 19, 9mm caliber pistol bearing serial number AKUK291;

4. a Taurus, model PT111 G2A, 9mm caliber pistol bearing serial number ACD780508;

5. a Strum & Ruger, model American Pistol, 9mm caliber pistol bearing serial number 830-38544;

6. a Strum & Ruger, model Security-9, 9mm caliber pistol bearing serial number 384-81490;

7. HS Produkt, model XD-9, 9mm caliber pistol bearing serial number BF483973;

8. a Davis Industries, model P380, .380 caliber pistol bearing serial number AP283672;

9. a Century Arms, model VSKA, 7.62x39mm rifle bearing serial number SV7135373;

1           10.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
2 number SV7135547;

3           11.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
4 number SV7158556; and

5           12.   a Century Arms, model VSKA, 7.62x39mm rifle bearing serial  
6 number SV7135772.

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of any of the offenses set forth in this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the convicted defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

3  
4 A TRUE BILL

5  
6 *Deputy* Foreperson *15/*

7 JOSEPH T. MCNALLY  
Acting United States Attorney

8 *Lindsey Greer Dotson*  
9 LINDSEY GREER DOTSON  
10 Assistant United States Attorney  
Chief, Criminal Division

11 SEAN D. PETERSON  
12 Assistant United States Attorney  
Chief, Riverside Branch Office

13 COURTNEY N. WILLIAMS  
14 Assistant United States Attorney  
Riverside Branch Office